

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

Bky. Case No. 17-42726

WYNIT Distribution LLC,

Chapter 11

Debtor.

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**NOTICE OF RECLAMATION DEMAND**

PLEASE TAKE NOTICE that Graphic Finishing Partners, LLC, a creditor in this proceeding, by and through its undersigned counsel, hereby files this notice of the delivery of a written demand ("Reclamation Demand"), pursuant to Section 546(c) of Title 11 of the United States Code ("Bankruptcy Code") and applicable non-bankruptcy law, on the above-captioned Debtor to reclaim certain goods. The goods that serve as the subject of the Reclamation Demand include the goods that were sold in the ordinary course of Graphic Finishing Partners, LLC's business with the Debtor and delivered to and received by the Debtor during the 45 days prior to the filing of the Debtor's bankruptcy case. Upon information and belief, the Debtor has not paid for these goods and the Debtor was insolvent at the time they received delivery of the goods. Attached as **Exhibit A** and incorporated herein by reference is the Reclamation Demand that was delivered to the Debtor.

PLEASE TAKE FURTHER NOTICE that the filing of this notice is not intended to constitute an election of remedies or to waive any of Graphic Finishing Partners, LLC's rights under the Bankruptcy Code or applicable non-bankruptcy law. Graphic Finishing Partners, LLC reserves all of its rights and remedies, including, without limitation: (i) the

right to amend or otherwise modify this notice and/or the Reclamation Demand; and (ii) to assert an administrative claim pursuant to Section 503 of the Bankruptcy Code.

Dated: September 28, 2017

MOSS & BARNETT  
A Professional Association

By /e/ Sarah E. Doerr  
Sarah E. Doerr, #338679  
150 South Fifth Street, Suite 1200  
Minneapolis, Minnesota 55402  
Telephone: (612) 877-5297  
Fax: (612) 877-5999  
E-Mail: Sarah.Doerr@lawmoss.com  
**Attorneys for Graphic Finishing Partners,  
LLC**



September 27, 2017

***VIA E-MAIL AND MESSENGER***

Phillip J. Ashfeld, Esq.  
Edwin H. Caldie, Esq.  
Andrew J. Glasnovich, Esq.  
Robert T. Kugler, Esq.  
Stinson Leonard Street  
150 South Fifth Street, Suite 2300  
Minneapolis, MN 55402

Re: In Re Wynit Distribution LLC Reclamation Demand  
Bky. Case No. 17-42726 (D. Minn.)  
Our File No. 57224.1

Dear Messrs. Ashfeld, Caldie, Glasnovich and Kugler:

Enclosed please find a Reclamation Demand from Graphic Finishing Partners, LLC, made pursuant to 11 U.S.C. § 546(c).

Very truly yours,

A handwritten signature in black ink, appearing to read "Sarah E. Doerr", is written over a horizontal line.

**Sarah E. Doerr**

Attorney at Law  
P: (612) 877-5297 F: (612) 877-5024  
Sarah.Doerr@lawmoss.com

SED/mam

Enclosure

Cc: Wynit Distribution LLC (Via FedEx)  
3828476v1

**EXHIBIT A**

**RECLAMATION DEMAND**

To: Wynit Distribution LLC, 9700 W. 76<sup>th</sup> Street, Suite 116, Eden Prairie, MN 55344,  
c/o Stinson Leonard Street, 150 S 5<sup>th</sup> St, Suite 2300, Minneapolis, MN 55402.

PLEASE TAKE NOTICE that Graphic Finishing Partners, LLC (the "Reclaiming Creditor"), by its undersigned attorney, hereby serves this Reclamation Demand and demands reclamation and return of the following goods that were delivered to you on credit in the ordinary course of business within forty-five days of the filing of your Chapter 11 bankruptcy petition in the District of Minnesota on September 8, 2017.

**GOODS TO BE RECLAIMED**

Any and all of the goods (the "Goods") that were delivered to you between July 25, 2017 and September 7, 2017, including, without limitation, the Goods referred to on the annexed **Exhibit A** which includes the pertinent invoices and a summary thereof.

We hereby demand immediate return of these Goods pursuant to our rights of reclamation under 11 U.S.C. § 546(c) of the United States Bankruptcy Code and § 336.2-702(2) of the applicable Uniform Commercial Code. We also hereby reserve the right to amend and supplement this Reclamation Demand as additional information becomes available.

The rights exercised in this Reclamation Demand are in addition to, and are not a waiver of, any right of the Reclaiming Creditor pursuant to 11 U.S.C. §§ 503(b)(9) and 507 and any other section of the United States Bankruptcy Code or the applicable Uniform Commercial Code. The Reclaiming Creditor intends to file any and all of appropriate claims against Wynit Distribution, LLC or its affiliates in bankruptcy to obtain payment for the Goods or their return.

MOSS & BARNETT

Dated: September 27, 2017

By   
Sarah E. Doerr (MN Bar. No. 338679)  
150 S 5<sup>th</sup> St, Suite 1200  
Minneapolis, MN 55402  
Telephone: (612) 877-5297  
[Sarah.Doerr@lawmoss.com](mailto:Sarah.Doerr@lawmoss.com)

**Attorneys for Graphic Finishing Partners,  
LLC**

# EXHIBIT A

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**SUMMARY OF INVOICES SUBJECT TO RECLAMATION DEMAND OF  
GRAPHIC FINISHING PARTNERS, LLC  
In re: WYNIT DISTRIBUTION, LLC, ET AL.  
Case No. 17-17-42726 (Bankr. D. Minn.)**

A summary of the invoices subject to Graphic Finishing Partners' reclamation demand is below.

<b>Customer</b>	<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Date of Receipt</b>	<b>Location</b>	<b>Total</b>	<b>Invoice Attached</b>
Wynit Distribution, LLC	1007711	8/15/17	8/18/17	Nevada Warehouse	\$37,434.00	Yes
Wynit Distribution, LLC	1007712	8/15/17	8/15/17	Tennessee Warehouse	\$43,035.45	Yes
				<b>TOTAL: \$80,469.45</b>		



**Graphic Finishing  
partners**

**Graphic Finishing Partners, LLC**

P.O. Box 1097  
Maryland Heights, MO 63043-9150  
(800) 986-2005 FAX (314) 685-1363  
sales@gfpartnersllc.com

**INVOICE**

CUST.#: 1043

UPC VENDOR	INVOICE DATE	ORDER NO.
000000	08/15/17	1007711-00
P.O. NO.		PAGE #
313222		1

BILL TO: WYNIT  
2 W. WASHINGTON STREET  
SUITE 500  
GREENVILLE, SC 29601

SHIP TO: WYNIT DISTRIBUTION, LLC  
C/O NEVADA DIST. SERVICES  
625 WALTHAM WAY SUITE 104  
MCCARRAN, NV 89434

REFERENCE	ORDERED BY	
SHIP VIA		
Truck-Other		
SHIP POINT	SHIPPED	TERMS
Graphic Finishing Partners LLC	08/14/17	Net 30 Days

sales@gfpartnersllc.com

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	UNIT PRICE	AMOUNT (NET)
<p>Make checks payable to: Graphic Finishing Partners, LLC P.O. Box 1097 Maryland Heights, MO 63043</p> <p>SHIPPED 8/14/17</p> <p>UPS FREIGHT PRO# 806175462</p>							
1	255-C 255 C 55" COLD LAMINATOR Serial #: 1703255C022	1	0	1	each	2899.00	2899.00
2	355-TH 355 TH 55" TOP HEAT LAMINATOR Serial #: 1704355TH033	5	0	5	each	3515.00	17575.00
3	363-TH 363 TH 63" TOP HEAT LAMINATOR Serial #: 1705363TH070	1704355TH034 3	0	1704355TH035 3	each	1706355TH036 3955.00	1706355TH037 11865.00
4	563TH-2 563TH-2 63" TOP HEAT LAMINATOR Serial #: 1612563TH2200	1705363TH071 1	0	1705363TH072 1	each	5095.00	5095.00
5	563-123 563TH MACHINE STAND - Version 2	1	0	1	each	0.00	0.00
6	FC FREIGHT CHARGE	1	0	1	each	1500.00	1500.00
7	FA100 FREIGHT ALLOWANCE 100%	1-	0	1-	each	1500.00	1500.00
7	Lines Total					Total Invoice Total	37434.00 37434.00



**Graphic Finishing Partners, LLC**

P.O. Box 1097  
Maryland Heights, MO 63043-9150  
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**INVOICE**

CUST.#: 1043

UPC VENDOR	INVOICE DATE	ORDER NO.
000000	08/15/17	1007712-00
P.O. NO.		PAGE #
313223		1

BILL TO: WYNIT  
2 W. WASHINGTON STREET  
SUITE 500  
GREENVILLE, SC 29601

SHIP TO: WYNIT DISTRIBUTION LLC  
4550 QUALITY DRIVE SUITE 101  
MEMPHIS, TN 38118

REFERENCE		ORDERED BY	
SHIP VIA			
Truck-Other			
SHIP POINT		SHIPPED	TERMS
Graphic Finishing Partners LLC		08/14/17	Net 30 Days

sales@gfpartnersllc.com

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	UNIT PRICE	AMOUNT (NET)
<p>Make checks payable to: Graphic Finishing Partners, LLC P.O. Box 1097 Maryland Heights, MO 63043</p> <p>SHIPPED 8/14/17</p> <p>MCAIR FREIGHT</p>							
1	255-C 255 C 55" COLD LAMINATOR Serial #: 1703255C023	1	0	1	each	2899.00	2899.00
2	355-TH 355 TH 55" TOP HEAT LAMINATOR Serial #: 1706355TH038	3	0	3	each	3515.00	10545.00
3	363-TH 363 TH 63" TOP HEAT LAMINATOR Serial #: 1705363TH073	1706355TH039 4	0	1706355TH040 4	each	3955.00	15820.00
4	563TH-2 563TH-2 63" TOP HEAT LAMINATOR Serial #: 1612563TH2201	1705363TH074 2	0	1706363TH075 2	each	1706363TH076 5095.00	10190.00
5	563-123 563TH MACHINE STAND - Version 2	2	0	2	each	0.00	0.00
6	563-120 500 SERIES REWIND MOTOR	2	0	2	each	200.00	400.00
7	563-121 563-2 REWIND TUBE ASSEMBLY	1	0	1	each	75.00	75.00
8	KPB-55450 KRAFT PAPER 30# BROWN 55 X 450	3	0	3	each	61.29	183.87
9	MAW-51150 PSA 2 MIL WHITE MOUNT 51 X 150	2	0	2	each	126.29	252.58
10	TM3-51150 PSA 3 MIL TEXTURED UV MATTE 51 X 150	30	0	30	each	89.00	2670.00
11	FC FREIGHT CHARGE	1	0	1	each	1500.00	1500.00

Continued





**Graphic Finishing Partners, LLC**  
P.O. Box 1097  
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(800) 986-2005 FAX (314) 685-1363  
sales@gfpartnersllc.com

# INVOICE

CUST.#: 1043

UPC VENDOR	INVOICE DATE	ORDER NO.
000000	08/15/17	1007712-00
P.O. NO.		PAGE #
313223		2

BILL TO: WYNIT  
2 W. WASHINGTON STREET  
SUITE 500  
GREENVILLE, SC 29601

SHIP TO: WYNIT DISTRIBUTION LLC  
4550 QUALITY DRIVE SUITE 101  
MEMPHIS, TN 38118

REFERENCE	ORDERED BY	
SHIP VIA		
Truck-Other		
SHIP POINT	SHIPPED	TERMS
Graphic Finishing Partners LLC	08/14/17	Net 30 Days

sales@gfpartnersllc.com

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	UNIT PRICE	AMOUNT (NET)
12	FA100 FREIGHT ALLOWANCE 100%	1-	0	1-	each	1500.00	1500.00 -
12	Lines Total					Total Invoice Total	43035.45 43035.45